



Attachment 7

April 9, 1997

Mr. Lester Snow  
CALFED Bay-Delta Program Manager  
CALFED Bay Delta Program  
1416 9th Street, Suite 1155  
Sacramento, California 95814

Dear Mr. Snow:

I am writing in regard to the CALFED Bay-Delta program's recommendations on proposed levee set-backs, river meander projects and the establishment of a riparian forest on the Sacramento River. Since the devastating New Years Floods of 1997, CALFED, state and federal agencies, and others, have devoted significant attention to how these issues, and related flood control measures, may be addressed in the CALFED Bay-Delta program.

The Northern California Water Association (NCWA), and many of our members, have been actively involved in the New Years Floods of 1997. Sacramento Valley communities incurred terrible losses of life and property, while many agricultural water suppliers suffered significant damage to their infrastructure. Additionally, several of NCWA's directors, and executive director Richard Golb, were appointed to serve on Governor Wilson's Sacramento Valley Citizens' Advisory Committee in order to provide immediate and long-term flood recovery and prevention recommendations to Governor Wilson's Flood Emergency Action Team. We look forward to continuing our constructive participation on flood-related issues that affect the Sacramento Valley, including those addressed by the CALFED Bay-Delta Program.

In this regard, NCWA submits the following initial comments on recommendations reflected in the CALFED "Flood Protection Opportunities" and the "Proposed Fiscal Year 1998 Program Activities and Cost Estimate" documents. I urge you to consider our comments on all future funding and policy decisions affecting flood-related activities in the Sacramento Valley.

**Protection of Water Diversions and Screening Facilities:**

Nearly all farmers and water users along the Sacramento River depend on the current location of levees or other bank protection projects to maintain the river at certain "hard points" to ensure long-term water supplies. In recent years, many of these water users have installed fish screens on these diversions, while many more begin work to screen their diversions. CALFED staff must recognize that set back levees and river meander projects may significantly alter river levels, flows or change the course of the river, greatly affecting their ability to divert adequate water supplies or comply with stringent fish

screening criteria. In some cases, the river could move away from necessary pumping and fish screening facilities, similar to the case of the Parrot Phalen facility on Butte Creek this January. In some locations, establishing riparian forests along or near the river corridor may interfere with flood control objectives.

**NCWA Recommendation - A Phased Approach:**

NCWA recommends that CALFED, and participating agencies, adopt a three-phase approach to levee setback or meander programs, comprised of feasibility studies and modeling, demonstration projects and implementation through a representative stakeholder process.

1) CALFED, and participating agencies such as the U.S. Army Corps of Engineers, must complete a comprehensive feasibility study to evaluate the financial costs, scope and benefits, and cumulative impacts, of the proposed project. The study should apply to the entire Sacramento River, whether the project is for the unleveed, or leveed sections of the river. The potential for significant impacts to upstream and downstream landowners exists whether the program is implemented within the levees or above the levee system. Clearly, the study and analysis must be complete prior to the funding or initiation of any levee set-back or meander program, or purchasing easements or property in fee title within the Sacramento River floodplain.

CALFED, and participating agencies, must complete a comprehensive study to determine whether the establishment of such forests conflicts with flood control activities. The study should also determine if the establishment of the forest will also impair local reclamation districts efforts to adequately maintain and repair levees and flood control structures, including the removal of trees or habitat necessary to ensure the structural integrity of the levee. The study must be completed prior to establishing riparian forests within the leveed section of the Sacramento River.

2) CALFED, based on the analysis provided in the comprehensive feasibility study, should implement pilot or demonstration projects to fully evaluate potential hydrological and biological impacts to water users, for flood control management and to the environment. Demonstration projects should occur before consideration of full implementation of set-back, river meander and riparian projects.

Although some believe that levee set-backs and meander programs may reduce the downstream flood risk, and that riparian forests are compatible with flood control management, implementation of projects prior to comprehensive studies and demonstration projects could result in significant impacts to neighboring landowners. Accordingly, CALFED agencies should not purchase additional property on or near the Sacramento River that currently provides bank protection or stability if the lack of routine maintenance on the structure will have significant impacts to other upstream or downstream landowners.

3) CALFED, and participating agencies, must ensure that all stakeholders have an opportunity to fully participate in a representative process that prioritizes projects, recommends funding for implementation of river meander projects, set back levees, riparian forest projects, and for land or

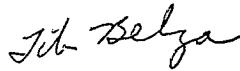
easement purchases and resolves stakeholder concerns prior to funding or implementation of any program. Although some consider the SB 1086 process as a surrogate for dealing with these issues, many directly involved in this program readily agree that it does not at this time serve as a representative process on these specific issues. Additionally, CALFED should immediately develop a forum for interested parties to review and comment upon CALFED's proposed FY 98 budget recommendations, and concurrent actions related to these issues.

**Maintenance and Repair:**

CALFED, and participating agencies, should recognize that set back levee or river meander projects do not serve to reduce or eliminate the real need for proper maintenance and repair of levees and flood control facilities. CALFED must ensure that proposed habitat restoration programs or activities will not impair current or future actions necessary to fully repair and maintain all flood control structures, including levees, weirs and bypasses.

I appreciate your consideration of our recommendations in regard to the CALFED Bay-Delta program, and look forward to continuing to work with you on the refinement of the program and successful resolution of these issues.

Sincerely,



Tib Belza  
Chairman